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Staff Attorney

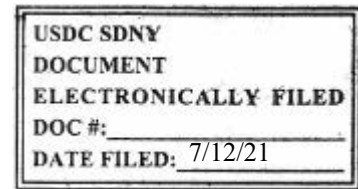
Immigration Practice



June 14, 2021

VIA ECF

Hon. Alison J. Nathan
Thurgood Marshall
United States Courthouse
40 Foley Square, Room 2103
New York, NY 10007



Re: *Barbecho v. Decker*, 20-cv-2821 (AJN)
Request for Modifications in Conditions of Release for Jose Molina

Dear Judge Nathan:

Petitioner writes to respectfully request that the Court modify the conditions of release for Jose Molina ("Mr. Molina") by ordering that his ankle monitor be removed. Immigration and Customs Enforcement ("ICE") has consented to this request. SO ORDERED.

Mr. Molina was released from immigration custody pursuant this Court's May 15, 2020 order. ECF No. 54. Since that time, Mr. Molina has complied with this Court's conditions of release, including being subject to an ankle monitor and participating in regular telephonic monitoring. Mr. Molina has no criminal record in the United States (charges stemming from prior arrests were dismissed in full on May 4, 2020), is married to a U.S. Citizen and is the father of a U.S. Citizen infant daughter, and is gainfully and lawfully employed. We are happy to provide supporting documentation if it is helpful to the Court.

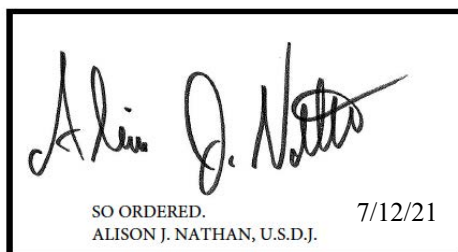
Mr. Molina's compliance with the conditions of release, absence of a criminal record, family ties, and full-time employment render long-term ankle monitoring unnecessary.

We thank the Court for its consideration of this matter.

Respectfully submitted,

/s/ Kyle Barron

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Counsel for Petitioner

cc: counsel of record via ECF